FEB 18 2003

No. 02-241

IN THE

Supreme Court of the United States

BARBARA GRUTTER,

Petitioner,

v.

LEE BOLLINGER, ET AL.,

Respondents.

ON WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

BRIEF OF 13,922 CURRENT LAW STUDENTS AT ACCREDITED AMERICAN LAW SCHOOLS AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

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INTEREST OF *AMICI CURIAE*

A group of 13,922 current law students at ABA-accredited American law schools submits this brief as *amici curiae* in support of Respondents Lee Bollinger, et al., urging the Court to affirm the Sixth Circuit's judgment that the promotion of diversity in higher education is a compelling governmental interest and that the consideration of race as one factor among many in admissions determinations is a permissible means of furthering diversity.[1] As current law students at accredited law schools across the country, *amici* are uniquely positioned to comment on the benefits accrued from diversity in legal education and will be uniquely affected by this decision of the Court. *Amici* believe that a racially diverse student body provides invaluable educational benefits.

Amici organized for the sole purpose of expressing to the Court the educational benefits derived from learning among and from students of varied ethnic and racial backgrounds. Listed among the signatories are White, African-American, Latino, Asian-Pacific-Islander, Native American, and Arab-American law students, men and women, from 143 of the 188 ABA-accredited law schools in this country.[2]

SUMMARY OF ARGUMENT

The Sixth Circuit was correct in holding that the promotion of diversity in higher education is a compelling

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[1] A complete list of *amici*, organized by law school attended, is included as Appendix A at 1a. This brief is submitted with the consent of the parties, who have filed with the Clerk of the Court blanket consents to the submission of *amicus curiae* briefs. Pursuant to Rule 37.6, counsel represent that this brief was not authored in whole or in part by counsel for any party. This brief was prepared and printed with financial assistance from the Student Bar Association and a non-tuition-based fund of the Georgetown University Law Center.

[2] A description of the method by which the names of *amici curiae* were collected is included as Appendix B at 203a.

governmental interest and that the consideration of race as one factor among many in admissions determinations is a permissible means of furthering diversity. Diversity imparts invaluable educational and social benefits to law students in several ways. First, a diverse student body exposes all law students to a robust exchange of ideas. Second, diversity encourages speculation, experimentation, and creation in law school. Third, a diverse student body insures that law students are not "isolate[ed] from the individuals and institutions with which the law interacts." *Sweatt v. Painter*, 339 U.S. 629, 634 (1950).

ARGUMENT

PROMOTING DIVERSITY IN HIGHER EDUCATION IS A COMPELLING GOVERNMENTAL INTEREST.

I. Justice Powell's Opinion in *Bakke*, Holding that Diversity is a Compelling Governmental Interest, is Controlling and Should be Followed.

In *Regents of the University of California v. Bakke*, this Court held that race could be used as a factor in higher education admissions. See 438 U.S. 265, 320 (1978) (opinion of the Court). In the narrowest opinion supporting that judgment, Justice Powell concluded that strict scrutiny should apply to such uses of race and that "the attainment of a diverse student body" was, in the context of "an institution of higher education," a compelling government interest. Id. at 311-314 (opinion of Powell, J.). Justice Powell's opinion on this matter is controlling. See *Marks v. United States*, 430 U.S. 188, 193 (1977). Thus, as Justice O'Connor explained in *Wygant v. Jackson Board of Education*, "a state interest in the promotion of racial diversity has been found sufficiently 'compelling,' at least in the context of higher education, to support the use of racial considerations in furthering that interest." 476 U.S. 267, 286 (1986) (O'Connor, J., concurring in part and concurring in judgment) (citations omitted).

Bakke's essential holding, that the attainment of diversity in higher education is a compelling governmental interest, is controlling in this case and should be followed.

II. A Diverse Student Body Imparts Invaluable Educational and Social Benefits To Law Students.

A. Diversity Contributes to a Wide, Robust Exchange of Ideas, Essential to the Discovery of Truth and to the Critical Debate Necessary to Legal Education.

The life experiences of individual law students are influenced by many factors. One of the most critical factors in shaping the life experience of many students has been their race. The principle is a familiar one: A student who was raised in South Dakota is likely to have a different life experience than one raised in New York City. While the geography and the consequent environment of one's childhood do not determine one's views, they certainly play a role in shaping an individual's perspective on a range of issues. Similarly, because of the continued salience of race in American society and the unquestionable fact that individual Americans continue to be treated differently in a wide range of circumstances based on their race, those individuals' race is a fundamentally important factor in shaping their life experiences and informing their views.

To acknowledge this reality is not to engage in pernicious stereotyping. To be clear: the Michigan admissions policy does *not* assume that all minority applicants embrace the same ideas or approach problems in the same way. It does *not* presume that common perspectives spring from inherent qualities attributable to one's race or ethnicity. What it *does* assume – with incontestable justification – is that certain applicants will bring to the classroom experiences borne of the social facts that race continues to matter, and that discrimination persists, in America. Equal treatment is the goal of the Equal Protection Clause. That goal cannot be pursued by denying

persons of color the truth of their experiences or other students the benefit of that truth. Rather, the goal of equal justice under law can only be understood and met by permitting minority students' experiences to be aired, examined, and compared with those of other students engaged in the common enterprise of exploring the proper role and content of law. Students may reach differing conclusions about the meaning or application of these experiences, but exposure to them is indispensable to a complete analysis of the types of legal, social, and political questions vetted daily in law school classes.

Only those who have lived these experiences can give authentic voice to them. For example, while Justice Thomas' recent remarks concerning the meaning of cross-burning may not be shared by all African-Americans, they were uniquely powerful because of the fact that he grew up as an African-American in the rural, segregated South. See Transcript of Oral Argument at 23-24 in *Virginia v. Black*, No. 01-1107. In the dynamic learning environment of the law school classroom, there is simply no substitute for the active participation of minority students. A reading assignment may bear witness to the experiences of persons of color, but it cannot apply those experiences to questions and issues that arise in discussion. A text may challenge, it may even enlighten, but it cannot debate.

As Justice Powell noted in *Bakke*, "[t]he Nation's future depends upon leaders trained through wide exposure to that robust exchange of ideas which discovers truth 'out of a multitude of tongues, [rather] than through any kind of authoritative selection.'" 438 U.S. at 312 (opinion of Powell, J.) (quoting *United States v. Associated Press*, 52 F. Supp. 362, 372 (S.D.N.Y. 1943) (internal quotation marks in original). *Amici*, as law students who will be among the nation's future leaders, strongly believe that such exposure to a robust exchange of ideas is not possible without a racially diverse student body.

In a racially homogeneous class of students, significant viewpoints would be missing. Understanding complex legal issues requires probing critical analysis. This analysis is considerably improved by the viewpoints of students who have a particular experience or understanding of laws that treat or affect people differently based on race or ethnicity. In criminal law classes, a discussion of racial profiling is incomplete without the view of someone who has experienced the practice first-hand or even the view of someone who is a member of a racial group disproportionately targeted by law enforcement. In constitutional law, the voice and viewpoint of a student of Japanese descent is invaluable in discussions concerning the effect of our nation's legal internment of Japanese-American citizens. Similarly, the viewpoints of minority students are necessary to fully comprehend and analyze issues concerning hate crimes legislation and anti-discrimination laws, the understanding of which necessarily depends on the interplay of race and society. Students of all races, when challenged with unfamiliar perspectives and ideas, are forced to question their own assumptions and develop a more informed understanding of the law. As race shapes many of our experiences and views, a racially diverse student body is necessary to present students of all races with a robust range of ideas and thus is a critical ingredient in any legal education. The consideration of race as a factor in the admissions process is permissible to achieve this goal.

B. Diversity is Essential to Fostering Speculation, Experimentation and Creation in Law School.

In *Bakke*, Justice Powell stated, "[t]he atmosphere of 'speculation, experiment and creation'— so essential to the quality of higher education – is widely believed to be promoted by a diverse student body." 438 U.S. at 312 (opinion of Powell, J.) (citations omitted). *Amici* wholeheartedly agree. Just as our racial and ethnic backgrounds contribute to our viewpoints and life

experiences, so too do they add to our collective ability to discover and encourage new ideas and approaches to addressing problems and resolving conflicts.

This atmosphere is apparent not only in class, but in activities in which students participate outside of the classroom, such as involvement in clinical programs, student organizations, and other extra-curricular activities including mock trial and law journal. These activities engage students in relationships with their colleagues and encourage students to think creatively with their peers to solve complex problems. Social relationships and the exposure of students to views inconsistent with their own, both inside and outside the classroom, add tremendously to students' ability to think creatively and innovatively. The benefits accrued from these interactions would be drastically limited in a racially homogeneous class of students.

C. Legal Education is Severely Diminished in Isolation from the Individuals and Institutions With Which the Law Interacts.

This Court recognized in *Sweatt v. Painter* that:

> [t]he law school, the proving ground for legal learning and practice, cannot be effective in isolation from the individuals and institutions with which the law interacts. Few students and no one who has practiced law would choose to study in an academic vacuum, removed from the interplay of ideas and the exchange of views with which the law is concerned.

339 U.S. at 634. Given that our country and legal system are composed of a racially diverse population, education in a homogeneous racial environment would deprive us of the interactions necessary for a successful career in the law.

In America today, our population is more racially diverse than it has ever been before.[3] Consequently, our future clients will come from a population more racially diverse than that faced by any previous class of graduating law students. It is not only logical, but it is also paramount, that we be exposed to interactions with individuals representative of our nation's diversity as we shape and develop the skills we will employ as lawyers. Our ability to communicate effectively will require respect, appreciation, and an understanding of our many clients' backgrounds and cultures. Our ability to build trust with clients of races and backgrounds other than our own cannot be fostered in a vacuum. Our interactions in college and law school provide the foundation for developing the skills necessary to successfully represent our clients, many of whom will have views and life experiences shaped by their race and ethnic background. As Justice Powell noted in *Bakke*, "it is not too much to say that the 'nation's future depends upon leaders trained through wide exposure' to the ideas and mores of students as diverse as this Nation of many peoples." 438 U.S. at 313 (quoting *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967)). Because our future clients will undoubtedly include individuals as diverse as our nation, we must develop in law school the necessary skills that only real relationships with individuals of a wide variety of racial backgrounds can provide.

Our nation's judges, lawyers, law enforcement officials, court clerks, and jurors are and will continue to be representative of our country's growing diversity as well. Our ability to function as effective lawyers will not only stem from our ability to reason and articulate fine points of

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[3] See Frank Hobbs & Nicole Stoops, Demographic Trends in the 20th Century, Figure 3-3 at 77 (U.S. Census Bureau, Census 2000 Special Reports, U.S. Government Printing Office 2002) (showing white U.S. population shrank to 75.1% while non-white U.S. population grew to 24.8% in 2000), available at: http://www.census.gov/prod/2002pubs/censr-4.pdf (last visited February 14, 2003).

law, but will also be founded on our knowledge and understanding of our colleagues and those who are responsible for the functioning of the American legal system. Ensuring that we are exposed to individuals of diverse racial backgrounds and their experiences will have a profound impact on our ability to succeed as lawyers.

CONCLUSION

Amici curiae, 13,922 current law students at accredited American law schools, are convinced that, based on our own individual experiences, a diverse student body imparts invaluable educational benefits to law students. The Sixth Circuit's conclusion that diversity is a compelling governmental interest should be affirmed.

Respectfully submitted,

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APPENDIX A

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APPENDIX B

Note on the method by which the names of *amici curiae* were collected:

The students who conceived this brief and organized *amici curiae* circulated to interested students at ABA-accredited law schools copies of a draft of the brief, along with sheets for the collection of signatures of current law students interested in being represented as *amici*. A copy of the signature sheet is reproduced on the next page.

Students wishing to be represented as *amici* were required to attest by their signature that they are currently enrolled as students at an ABA-accredited law school, and to assert that they have read the brief, support its arguments, and wish to be included among those on whose behalf the brief is submitted to this Court. Students collecting signatures were required to attest by their signature that they had witnessed the signatures on the sheet and that each signatory displayed a school-issued photo I.D. which verified his or her identity and enrollment in an ABA-accredited law school. Copies of the original signature sheets are on file with counsel for *amici curiae*. Every effort has been made accurately to transcribe the name of each *amicus* on whose behalf this brief is submitted.

LIST OF LAW STUDENT SIGNATORIES TO AMICUS CURIAE ("FRIEND OF THE COURT") BRIEF IN FAVOR OF DIVERSITY IN HIGHER EDUCATION IN *GRUTTER V. BOLLINGER*, THE UNIVERSITY OF MICHIGAN LAW SCHOOL AFFIRMATIVE ACTION CASE PENDING BEFORE THE U.S. SUPREME COURT

Please read carefully before signing!

You must present a valid, ABA-accredited law school ID demonstrating your current enrollment at the time of signing. Your name and Law School are the only information that will be submitted to the Court. You may provide your email address and we will use this information only to keep you up to date on our progress and on the case.

Important note: This brief is subject to minor formatting and stylistic changes. The substance and the arguments of the brief will not change. If you have any questions, please email: diversitybrief@hotmail.com.

By signing my name on this page I assert that I have read the **BRIEF OF 2000+ [final number to be inserted] CURRENT LAW STUDENTS AT ACCREDITED AMERICAN LAW SCHOOLS AS AMICI CURIAE IN SUPPORT OF RESPONDENTS,** support its arguments, and ask that I be listed among those represented in it as amici curiae (friends of the court). I am aware that my *name* and the *law school* I attend will be included in a list of amicus curiae attached as an appendix to the brief and that this brief will be submitted to the United States Supreme Court in the upcoming case of *Grutter v. Bollinger*, No. 02-241. I further attest that I am *currently* enrolled as a student at an ABA-accredited law school.

Name (please print legibly)	Law School	Email (optional)	Signature	Date

Statement of Signature Gatherer: I hereby attest that I gathered and witnessed the above signatures. I further attest that each signatory displayed a school issued photo I.D. which verified his or her identity and enrollment in an ABA accredited law school.

Signature	Date	Print Full Name	Address	e-mail address	Phone Number

BEST AVAILABLE COPY